

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF PUERTO RICO**

VICKY RODRÍGUEZ TORRES, et al.

Plaintiffs

v.

GOVERNMENT DEVELOPMENT BANK
FOR PUERTO RICO, et al.

Defendants

CIVIL No. 09-1151 (JP)

TITLE VII VIOLATIONS, AGE &
SEX DISCRIMINATION, TORTS

PLAINTIFF DEMANDS A TRIAL
BY JURY

**STATEMENT UNDER PENALTY OF
PERJURY PURSUANT TO 28 U.S.C. § 1746**

I, Marine Comas Torres, of legal age, single, Recruiting and Nominations Director of the Government Development Bank ("GDB"), and resident of Carolina, Puerto Rico, under penalty of perjury, pursuant to 28 U.S.C. § 1746, state and affirm as follows:

1. My personal circumstances are as previously stated.
2. During the period of December 17, 2007 through June 30, 2008, I worked as Human Resources Director for the GDB. On July 1, 2008 I returned to my position as Recruiting and Nominations Director for the GDB.
3. On September 12, 2002, Vicky Rodríguez was transferred to the role of Account Executive in the Private Financing Department under Harry de Jesús' supervision, Senior Account Executive.
4. When transferred to the Private Financing Department Rodríguez did not have any person under her supervision. Notwithstanding, on October 5, 2004, Roberto Rodríguez, was transferred to the Private Financing Department. Vicky Rodríguez was his immediate supervisor.

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-2-

5. In early 2008, the Municipal Financing Department experimented immediate and pressing personnel needs which arrive after the first wave of Act 188's Early Retirement Plan took place.

6. Insofar as the Private Financing Department's workload was very light and the Account Executives were performing Tourism Development Fund rather than GDB work, Luis Alfaro and I determined that the Bank's resources would be more effectively used at the Municipal Financing Department. Thus, Vicky Rodríguez and Roberto Rodríguez, Analyst, as the least senior employees, were selected for the transfer. Only Harry de Jesús remained at the Private Financing Department to assist Ramos.

7. On Friday April 4, 2008, I met with Rodríguez, José Chaves ("Chaves"), Director of GDB's Labor Relations, Enid López, Municipal Financing Department Director, and Luis Alfaro ("Alfaro"), GDB's Financing Director to discussed with her the nature of her administrative transfer ("destaque") to the Municipal Financing Department. We explained her that the transfer was on a temporary basis and that she would be collaborating in various matters as needed. Thus, no specific position requirements were identified or created.

8. Throughout this time, she retained her position as Account Executive in the Private Financing Department. She also retained her employee's benefits as an Account Executive.

9. From November 17, 2008 to December 15, 2008, Rodríguez took a vacation leave.

10. I never took any adverse employment action against Rodríguez on the basis of her age, sex or any other protected activity. Also, I had never witnessed any conduct on the part of Rodríguez' co-workers or supervisors which would lead me to believe she was being discriminated or was "at risk of injury". Moreover, Rodríguez herself never brought any complaint of this nature

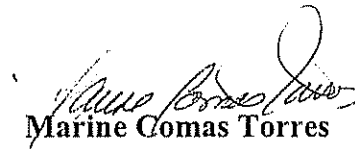
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-3-

to my attention.

I, Marine Comas Torres, declare under penalty of perjury under the laws of the United States of America that all of the foregoing is true and correct to the best of my personal knowledge.

WHEREFORE, I subscribe the present statement in San Juan, Puerto Rico, on this 14th day of January 2010.


Marine Comas Torres